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Attorneys for Plaintiff PHILLIP HEREDIA on behalf of himself,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

PHILLIP HEREDIA on behalf of
himself, all others similarly situated, and
on behalf of the general public,

Plaintiffs,

v.

SUNBELT TOWING, INC.; WESTERN
TOWING, INC.; and DOES 1-100,

Defendants.

Case No. 37-2023-00023634-CU-OE-CTL

**DECLARATION OF COLETTE
MAHON, ESQ., IN SUPPORT OF
PLAINTIFF'S MOTION FOR PAGA
SETTLEMENT APPROVAL**

*[Assigned for All Purposes to the Honorable
Gregory W. Pollack; Dept. C-71]*

Date: February 27, 2026

Time: 9:00 a.m.

Complaint Filed: September 23, 2024

Trial Date: None Set

I, Colette Mahon, declare:

1 1. I am a member of the bar of the State of California and an attorney at Lawyers for
2 Employee and Consumer Rights (“LFEER”). I make this declaration of personal, firsthand
3 knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

4 2. LFEER is a law firm dedicated to protecting the rights of employees in the
5 workplace. We are dedicated to the prosecution of wage and hour and wrongful termination
6 matters in state and federal courts, and before various arbitration tribunals.

7 3. My firm and I handle exclusively employee-side employment cases which involve
8 violations of the California Labor Code and Industrial Welfare Commission Wage Orders, such
9 as wage and hour class actions and cases alleging violations of the Private Attorneys General Act
10 of 2004 (“PAGA”).

11 4. LFEER is currently involved in litigation in over fifty (50) PAGA and class cases.

12 5. My firm has been granted class certification in both state and federal courts.

13 6. Former lead attorney, Sabrina Sanders received her Juris Doctorate in 2003 from
14 Golden Gate University, School of Law. She has been admitted to the State Bar of California
15 since December 2004. Prior to being licensed, she served as a research attorney for the Los
16 Angeles Superior Court. Due to her academic background, which focused on employment law,
17 she was assigned as the research attorney to handle complex employment class action cases
18 throughout Los Angeles County.

19 7. Ms. Sanders served as LFEER’s managing attorney from 2016 through 2025. Since
20 2004, she had been engaged in litigation. She has served as lead counsel on hundreds of
21 employment cases and tried cases in State courts, resulting in verdicts in favor of all her clients.
22 Much of her practice has been dedicated to litigating labor and employment disputes, with the
23 last 10 years exclusively dedicated to representing employees on claims against their employers
24 on a contingency.

25 8. Former lead attorney on this matter, Peter Horton, graduated from California
26 Western School of Law and was admitted to practice law in California in December 2003. Mr.
27 Horton has practiced in State and Federal courts since being admitted to practice law.
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1 9. All services were performed by Plaintiff's Counsel on a contingent basis with no
2 guarantee of any payment. Had the litigation continued, the Defendant would undoubtedly have
3 mounted an aggressive defense. A defeat on the merits would have foreclosed the possibility of
4 any remuneration for Plaintiff's Counsel's time and effort.

5 10. I believe that the settlement amount of \$300,000 is a reasonable and fair settlement
6 amount.

7 I hereby declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct.

9
10 Dated: January 30, 2026

**LAWYERS FOR EMPLOYEE AND
CONSUMER RIGHTS**

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Colette Mahon, Esq.
Attorneys for Plaintiff PHILLIP HEREDIA